

SHER TREMONTE LLP

January 11, 2023

BY ECF

The Honorable Ronnie Abrams
United States District Judge
Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square
New York, New York 10007

Re: *United States v. Yoel Abraham, et al.*, 20-CR-411 (RA)

Dear Judge Abrams:

We represent Yoel Abraham, a defendant in the above-referenced case. We write in response to the Court's January 5, 2023 Order directing Mr. Abraham to file a motion to seal as to the six redacted exhibits he had filed as part of his motion to suppress. ECF 101.

As the Court is aware, there is a protective order in place which requires all parties to file information deemed sensitive by the government under seal or with redactions. ECF 53 at 4. The exhibits at issue were filed in fully redacted form because we erroneously believed the documents had been deemed sensitive. After further discussion with the government, we have determined that these documents have not been deemed sensitive. Most of these exhibits, however, contain personal identifiable information that should be redacted pursuant to Rule 49.1 of the Federal Rules of Criminal Procedure and/or otherwise personal information. Accordingly, we plan to review the documents, in conjunction with the government, in order to determine whether the exhibits should be filed publicly, filed publicly with redactions pursuant to Rule 49.1, and/or withdrawn. We are currently reviewing the exhibits to ensure the proper course of action, and plan to confer with the government to the extent there is uncertainty about any of our proposed redactions. We respectfully request a one-week extension, until January 18, 2023, for us to complete our review and, if necessary, engage in such discussions with the government. At that time, we will re-file or withdraw the exhibits as appropriate.

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The government consents to this request. We appreciate Your Honor's consideration.

Application granted.

SO ORDERED.



Hon. Ronnie Abrams
United States District Judge
1/12/2023

/s/

Justine A. Harris

Noam Biale

Maya Brodziak

CC: All counsel by ECF